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(RED)UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III841 Chestnut Building
Philadelphia, Pennsylvania 19107

OCT 16 1990

SUBJECT: Addendum to the Shaffer Equipment Action Memo

FROM: Robert E. Caron, On-Scene Coordinator
USEPA Region III
Eastern Response Section (3HW31)TO: Mark Mjones, Chief
Eastern Operations Section (OS-210)

ISSUE:

The purpose of this memo is to clarify the nature of the threat posed by the Shaffer Equipment Site in Minden, Fayette County, West Virginia. Additional PCB contamination found in June of this year exceeds the previously determined action level of 50 ppm, prompting the need for a new Removal action.

BACKGROUND:

Sampling performed on June 12, 1990 indicated the presence of new PCB contamination in areas where previous cleanup did not occur. Sampling of these areas in 1987 did not indicate any contamination. Further investigation indicates that this contamination is new and is most likely the result of building cleanout which occurred when Shaffer Equipment ceased operations in 1988. Levels of PCB contamination are as high as 40,000 ppm.

THREAT:

The Centers for Disease Control (CDC) was consulted in December of 1984 and again in February of 1985. Memos and telephone consult records are attached. At that time CDC certified that conditions at the site presented an imminent threat to public health via direct contact due to the high levels of PCB found in onsite soils. In addition, CDC strongly recommended source control to eliminate the potential for off site migration.

The new contamination found in June of this year presents the same set of conditions that existed in 1984/1985. The site is readily accessible and still subject to flooding and off site migration of contaminants. Therefore, the OSC has determined that additional Removal actions are warranted in order to protect public health and the environment.

Removal Action Level of 50 ppm:

The removal action level of 50 ppm will be used at this site in order to remain consistent with previous action levels set in 1985. This level is consistent with available guidance from the Office of Research and Development and the TSCA PCB spill cleanup policy and is considered as being protective of public health. Excavation of soil will be conducted consistent with the TSCA PCB spill cleanup policy for non-restricted access areas, followed by a backfill of at least ten inches of clean soil.